ELLIOTT & ELLIOTT, P.A.

ATTORNEYS AT LAW

1508 Lady STREET
COLUMBIA, SOUTH CAROLINA 29201
selliott@cfliottlaw.us

SCOTT ELLIOTT

TELEPHONE (803) 771-0555 FACSIMILE (803) 771-8010

March 30, 2018

VIA E-FILING

Ms. Jocelyn Boyd Chief Clerk of the Commission SC Public Service Commission P. O. Drawer 11649 Columbia, SC 29211

RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc. for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for prudency regarding the abandonment of the V.C. Summer Units 2 & 3 and associated customer benefits and cost recovery plan.

Docket No. 2017-370-E

Dear Ms. Boyd:

Enclosed please find for filing a Petition to Intervene filed on behalf of the South Carolina Energy Users Committee ("SCEUC") in the above-captioned matter. By copy of this letter, I am serving all parties of record.

If you have questions, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.

Scott Elliott

SE/lbk

Enclosure

cc: All parties of record (w/encl.)

STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-370-E

IN THE MATTER OF:	
Joint Application and Petition of South)
Carolina Electric & Gas Company and) PETITION TO INTERVENE
Dominion Energy, Inc. for review and)
approval of a proposed business)
combination between SCANA)
Corporation and Dominion Energy, Inc.,)
as may be required and for prudency)
determination regarding the abandonment)
of the V.C. Summer Units 2 & 3 Project)
and associated merger benefits and cost)
recovery plan.)

The South Carolina Energy Users Committee ("SCEUC") hereby petitions the South Carolina Public Service Commission ("Commission") pursuant to R.103-825 of the Commission's rules and regulations to intervene and be made a party of record in the above-captioned docket. In support of this Petition, SCEUC would allege as follows:

1. That on January 12, 2018, the South Carolina Electric & Gas Company ("SCE&G") and Dominion Energy, Inc. ("Dominion") filed a Joint Application and Petition for review and approval of a proposed business combination between SCANA Corporation and Dominion. In the Joint Application, SCE&G and Dominion also seek approval of a customer benefit and cost recovery plan for costs associated with the construction of the V.C. Summer Units 2 & 3 project. The Joint Petition also contains two alternative requests which SCE&G will pursue independently if the Merger does not close. Under the first alternative request, SCE&G asks that the Commission adopt a rate plan that can be funded by SCE&G and SCANA alone.

As a second alternative, SCE&G will seek the recovery of all costs and investments associated with the NND Project allowable by law but without mitigation provisions and without seeking any present rate increase.

- 2. That SCEUC is an association organized in the State of South Carolina, consisting of large industrial consumers of energy which are engaged in various manufacturing enterprises throughout the State.
- 3. That a number of members of SCEUC purchase and consume substantial amounts of electricity from SCE&G.
- 4. That SCEUC and its members have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and the interests of its members are not adequately represented by the current parties to this proceeding.
- 5. That given the state of the record at this stage of the proceedings, SCEUC lacks sufficient information to fully develop and state its position in this proceeding at this time.
- 6. That granting SCEUC's request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing its views and concerns can be developed.
 - 7. That Petitioner is represented by counsel in this proceeding as follows:

Scott Elliott, Esquire
Elliott & Elliott, P.A.
1508 Lady Street
Columbia, South Carolina 29201
Telephone: 803-771-0555

Fax: 803-771-8010

selliott@elliottlaw.us

WHEREFORE, Petitioner prays for the following relief:

- a. That this Petition to Intervene be accepted and that Petitioner be made a party of record;
- b. That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- c. For such other and further relief as is just and proper.

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Scott Elliott, Esquire
ELLIOTT & ELLIOTT, P.A.
1508 Lady Street

Columbia, SC 29201 (803) 771-0555

Attorney for the South Carolina Energy Users Committee

Columbia, South Carolina

March 29, 2018

CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that (s)he has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE:

Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Inc. for review and approval of a proposed business combination between SCANA Corporation and Dominion Energy, Inc., as may be required, and for prudency regarding the abandonment of the V.C. Summer Units 2 & 3 and associated customer benefits and cost recovery plan.

Docket No.:

2017-370-E

PARTIES SERVED:

Z CI - J D T ! .
K. Chad Burgess, Esquire
Matthew W. Gissendanner, Esquire
SCE&G/SCANA Corporation
220 Operation Way - MC C222
Cayce, SC 29033-3701
had.burgess@scana.com
natthew.gissendanner@scana.com
Mitchell Willoughby, Esquire
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC 29202
nwilloughby@willoughbyhoefer.com
ohn H. Tiencken, Jr., Esquire
Christopher H. McDonald, Esquire
Ciencken Law Firm, LLC
34 Seven Farms Drive, Suite 114
Charleston, SC 29492
tiencken@tienckenlaw.com
mcdonald@tienckenlaw.com
Robert Guild, Esquire
14 Pall Mall Street
Columbia, SC 29201
guild@mindspring.com
ソランドリローノス・アロロア

J. Blanding Holman, IV, Esquire	Robert E. Tyson, Jr., Esquire
Elizabeth Jones, Esquire	Sowell Gray Robinson Stepp & Laffitte
William C. Cleveland IV, Esquire	Post Office Box 11449
Southern Environmental Law Center	Columbia, SC 29211
463 King Street - Suite B	rtyson@sowellgray.com
Charleston, SC 29403	
bholman@selcsc.org	
ejones@selcsc.org	
wcleveland@selcsc.org	
	G. 1 ' H.E.A. E.
Elanie Ryan, Esquire	Stephanie U. Eaton, Esquire
Joseph Reid III, Esquire	Spilman Thomas & Battle, PLLC
McGuire Woods, LLP	110 Oakwood Drive, Suite 500
800 East Canal Street, Gateway Plaza	Winston-Salem, NC
Richmond, VA 23219	seaton@spilmanlaw.com
eryan@mcguirewoods.com	
<u>jreid@mcguirewoods.com</u>	
Derrick Price Williamson, Esquire	Lara R. Brandfass, Esquire
Spilman Thomas & Battle, PLLC	Spilman Thomas & Battle, PLLC
1100 Bent Creek Blvd., Suite 101	300 Kanawha Boulevard, East
Mechanicsburg, PA 17050	Charleston, WV 23501
dwilliamson@spilmanlaw.com	lbrandfass@spilmanlaw.com
Lynn Teague	Frank Knapp, Jr.
3728 Wilmot Avenue	118 East Selwood Lane
Columbia, SC 29205	Columbia, SC 29212
TeagueLynn@gmail.com	fknapp@knappagency.com
Alexander G. Shissias, Esquire	Ellen Ruff, Esquire
The Shissias Law Firm, LLC	McGuireWoods, LLP
1422 Laurel Street	201 North Tyron St., Suite 3000
Columbia, SC 29201	Charlotte, NC 28202
alex@shissiaslawfirm.com	eruff@mcguirewoods.com
Emily W. Medlyn, General Atttorney	J. David Black, Esquire
U.S. Army Legal Services Agency -	Nexsen Pruet, LLC
Regulatory Law	Post Office Drawer 2426
U.S. Army Legal Services Agency -	Columbia, SC 29202
Regulatory Law	DBlack@nexsenpruet.com
9275 Gunston Road	
Fort Belvoir, VA 22060	
emily.w.medlyn.civ@mail.mil	
James F. Walsh Jr., Esquire	James N. Horwood, Esquire
City of Orangeburg	Department of Public Utilities of the City
1436 Amelia Street	of Orangeburg
Orangeburg, SC 29116	Spiegel & McDiarmid
jfwwalsh@bellsouth.net	1875 Eye Steet, NW Suite 700
	Washington, DC 20006
	james.horwood@spiegelmcd.com

Jessica R. Bell, Esquire Peter J. Hopkins, Esquire Stephen Pearson, Esquire Spiegel & McDiramid, LLP 1875 Eye Street, NW Suite 700 Washington, DC 29006 jessica.bell@spiegelmcd.com peter.hopkins@spiegelmcd.com steve.pearson@spiegelmcd.com	Lisa Booth, Esquire Dominion Energy Services, Inc. 120 Tredegar St., Riverside 2 Richmond, VA 23233 lisa.s.booth@dominionenergy.com
William T. Dowdey William T. Dowdey 811 Jefferson Street West Columbia, SC 29169 wtdowdwy@gmail.com	

PLEADING:

SOUTH CAROLINA ENERGY USERS COMMITTEE PETITION TO INTERVENE

March 30, 2018

Linda B. Kitchens, Paralegal ELLIOTT & ELLIOTT, P.A.

1508 Lady Street

Columbia, South Carolina 29201

(803)771-0555 linda@elliottlaw.us